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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Rulemaking to Amend Parts 1, 2, 21,
and 25 of the Commission's Rules
to Redesignate the 27.5-29.5 GHz
Frequency Band, to Reallocate
the 29.5-30.0 GHz Frequency Band,
to Establish Rules and Policies for
Local Multipoint Distribution Service
and for Fixed Satellite Services

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CC Docket No. 92-297

TO: THE COMMISSION

Comments of Farmers Telephone Cooperative, Inc. ("FTC"), pursuant
to FCC Rule Section 1.415, respectfully submits these Comments in response to the
Commission's Fourth Notice of Proposed Rule Making released on July 22, 1996 (FCC
96-311) (hereafter the "Fourth NPRM"). Through these comments, FTC opposes
eligibility limitations and restrictions on local exchange carriers ("LECs"), particularly
LECs in rural areas, who find Local Multipoint Distribution Service ("LMDS") to be a
means to offer new and useful services to their communities.

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Background

Farmers Telephone Cooperative, Inc. ("FTC") is organized as member-owned cooperative in rural South Carolina. We serve approximately 46,000 access lines in five different counties and across over 3,000 square miles. Formed in 1951, FTC has been an industry leader in providing telecommunications services to our members/owners. We continue to attempt to provide the highest quality service at the lowest possible price. However, competition will, by definition, force us to become even more efficient, aggressive, and responsive. the "Telecommunications Act of 1996" may well open our established markets to others. While we are prepared to compete for each and every one of our customers, as we believe the Act was intended, we also need all the tools available to do so.

LECs Should Not Face License Restrictions from Providing LMDS Services

Competition allows companies to differentiate their products and services. Quality, price, and service are a few of the forms in which companies set themselves apart from other companies. Those who provide the most value to the customer are the successful competitors. Restricting Rural LECs from the LMDS spectrum, restricts a possible means for the LECs to provide services to our rural communities. We feel that the restriction would not benefit our rural customers.


LMDS technology is developing and not currently widely deployed. We feel limiting Rural LECs would withhold a technology from rural America that may offer services sooner versus later. Regardless of the technology or the company, we must earn our customers' business everyday.

We feel barriers to competition such as restrictions to LMDS are not in rural America's best interest. Enforce the rules of fair competition, but do not limit competition that may offer services to rural America.

Farmers Telephone Cooperative opposes all limitations to obtain or use the LMDS licenses in the offering of services to rural America. Restrictions would impede a rural LECs ability to compete and to offer diverse services to the rural customer.

Respectfully submitted,

Farmers Telephone Cooperative, Inc.



JOHN L. MCDANIEL
Executive Vice-President

**1101 East Main Street
Kingstree, SC 29556
Friday, August 9, 1996**

CERTIFICATE OF SERVICE

I, Loren Costantino, a secretary in the law office of Lukas, McGowan, Nace & Gutierrez, hereby certify that I have, on this 12th day of August, 1996, had a copy of the foregoing Comments of Farmers Telephone Cooperative, Inc. hand-delivered to the following:

Chairman Reed E. Hundt
Federal Communications Commission
1919 M Street, NW, Room 814
Washington, DC 20554

Commissioner James H. Quello
Federal Communications Commission
1919 M Street, NW, Room 802
Washington, DC 20554

Commissioner Rachelle B. Chong
Federal Communications Commission
1919 M Street, NW, Room 844
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Commissioner Susan Ness
Federal Communications Commission
1919 M Street, NW, Room 832
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Loren Costantino